Welcome to

Quality and Narrative Writing

Agenda

- ✓ Policy
- ✓ Contract Effort Description
- ✓ Ratings
- ✓ Narratives
- ✓ Helpful Hints and Resources
- ✓ Points of Contact

What is CPARS?

Contractor Performance Assessment Reporting System (CPARS)

Web-enabled application that collects and manages a library of automated contractor report cards

- ✓Two Modules Within CPARS
  - Contractor Performance Assessment Reporting System (CPARS) Module – Systems, Operations Support, Services, Information Technology, Architect-Engineer and Construction
  - Federal Awardee Performance and Integrity Information System (FAPIIS) Module

Regulatory Requirements

- ✓**FAR 42.1502**
  - Past Performance Evaluations Prepared:
    - At Least Annually
    - At Time Work Under Contract or Order is Completed
  - Past Performance Information Shall Be Entered Into CPARS
- ✓**FAR 42.1503**
  - Evaluation Factors
    - Technical
    - Cost Control
    - Schedule
    - Management
    - Small Business Subcontracting
    - Other

Regulatory Requirements (cont.)

- ✓**FAR 42.1503**
  - Evaluation Ratings Definitions
  - Evaluations Automatically Transmitted to Past Performance Information Retrieval System (PPIRS)
  - Agencies Shall Use PPIRS Information in Source Selections
    - Within 3 Years of Contract/Order Completion
    - 6 Years for Architect-Engineer and Construction
  - Past Performance Information Shall be Entered Into CPARS
- ✓**FAR 15.304**
  - Past Performance Shall be Evaluated in All Source Selections for Negotiated Competitive Acquisitions Expected to Exceed Simplified Acquisition Threshold

Guidance for CPARS Document

http://www.cpars.gov

- ✓Guidance
- ✓Applicability and Scope
- ✓Responsibilities Assigned
- ✓CPARS Timeline and Workflow
- ✓Frequency and Types of Reports
- ✓Administrative Information
- ✓References
- ✓Business Sectors
- ✓Rating Definitions
- ✓Instructions for Completing a CPAR

Available at www.cpars.gov on Guidance Tab

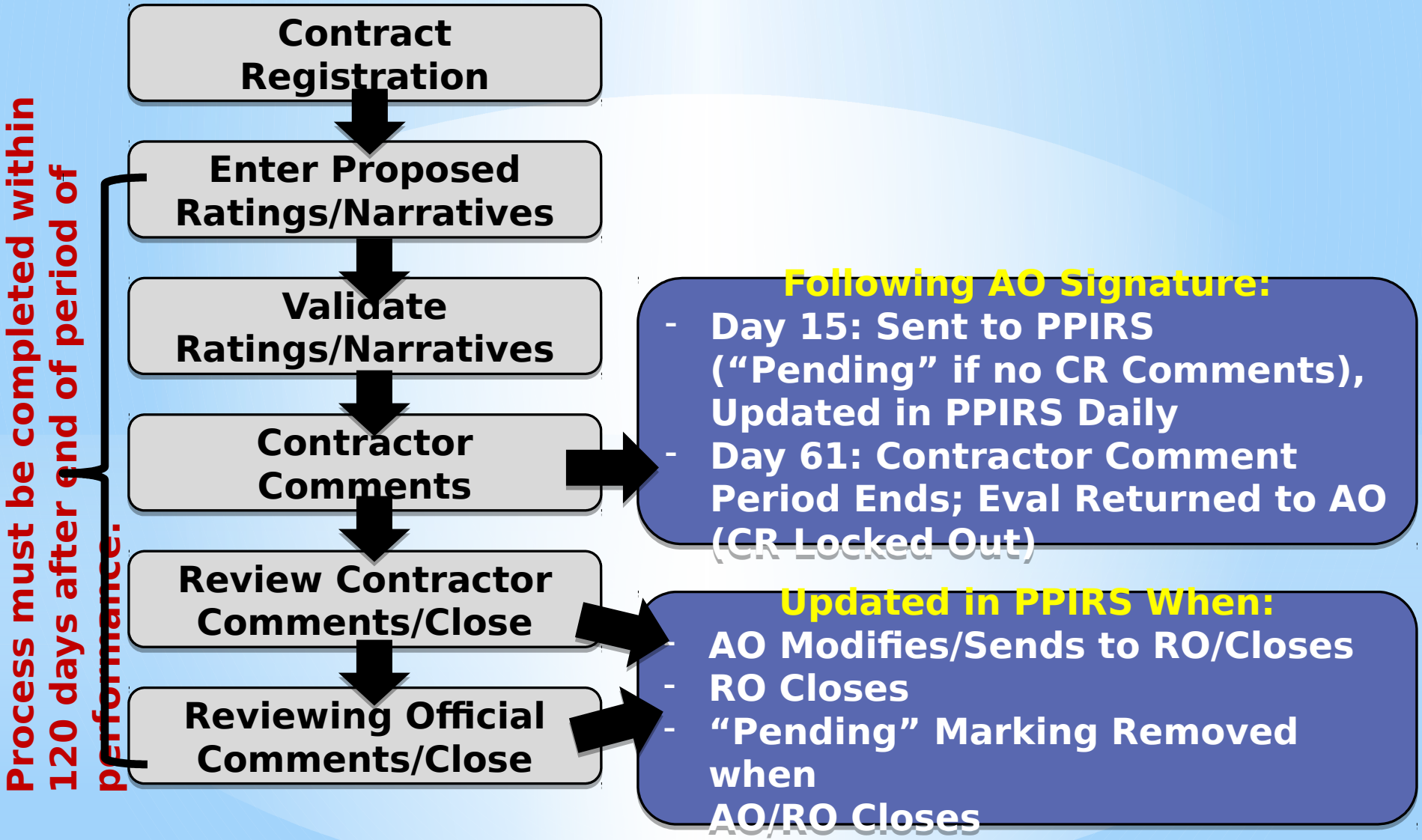
Need for Improvement

- ✓OFPP, Government Accountability Office (GAO), and Department of Defense (DoDIG) Inspector General Reviews/Audits
  - Eligible Contracts Not Being Registered in CPARS
  - Performance Reports Not Being Entered in CPARS in a Timely Manner
  - Narratives of Insufficient Detail to Show that Ratings are Credible and Justified

Need to improve quantity and quality of information available in PPIRS so that source selection officials have greater confidence in reliability and relevance of

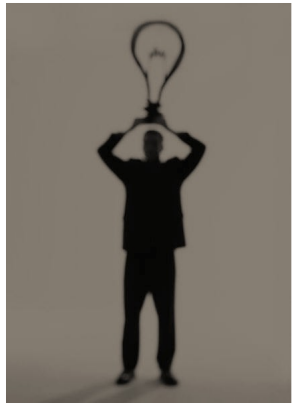
This class will help you avoid these pitfalls.

CPARS Workflow


Contract Registration
Enter Proposed Ratings/Narratives
Validate Ratings/Narratives
Contractor Comments
Review Contractor Comments/Close
Reviewing Official Comments/Close
Process must be completed within 120 days after end of period of performance.
Following AO Signature:
- Day 15: Sent to PPIRS ("Pending" if no CR Comments), Updated in PPIRS Daily
- Day 61: Contractor Comment Period Ends; Eval Returned to AO (CR Locked Out)
Updated in PPIRS When:
- AO Modifies/Sends to RO/Closes
- RO Closes
- "Pending" Marking Removed when AO/RO Closes

Contract Effort Description

- ✓ Complete Effort Description Identifying:
  - Key Technologies
  - Components
  - Subsystem Requirements
  - Complexity of Contract
  - Acronyms
  - Technical Terms
- ✓ Critical to Source Selection Officials
- ✓ Note Scope Changes Since Prior Evaluation



Sample Contract Effort Description

The contractor provides maintenance and support of VFED for the General Services Administration.

Sufficient? Yes or No

Sample Contract Effort Description

NOT Sufficient

The contractor provides maintenance and support of VFED for the General Services Administration.

Missing:

- Detail of Scope
- Complexity of Contract
- Key Technologies
- Definitions of Acronyms and Technical Terms

Sample Contract Effort Description

Sufficient

The Contractor provides maintenance and technical support for General Services Administration's Very Fancy Engine Database (VFED). VFED manages 24,000 engines and nearly 2 million serially tracked, life-limited, critical engine parts and components supported and maintained on a daily basis. This database is used for asset tracking, inventory management, tracking hours in flight, maintenance and repair records, warranty information, parts lists, and engine configuration. The Contractor is responsible for maintenance of the Oracle database and Apache software. VFED was developed by the previous incumbent. The Contractor is responsible for requirements analysis, upgrades, configuration management, and help desk technical support. Support during this evaluation period included two system upgrades and approximately 5000 help desk requests.

Elements Evaluated

- ✓ Quality
- ✓ Schedule
- ✓ Cost Control
- ✓ Management
- ✓ Small Business
- ✓ Regulatory Compliance
- ✓ Other Areas

Rating Areas
Quality

- ✓Assess Conformance to:
  - Contract Requirements
  - Specifications
  - Standards of Good Workmanship
- ✓Are reports/data accurate?
- ✓Does the product or service meet the specifications of the contract?
- ✓What degree of Government technical direction was required to solve problems that arose during performance?

Rating Areas Schedule

- ✓ Assess Timeliness of Completion Against:
  - Contract
  - Task/Delivery Orders
  - Milestones
  - Delivery Schedules
  - Administrative Requirements

Rating Areas
Cost Control

- ✓ Forecasting Cost
- ✓ Managing Cost
- ✓ Controlling Cost
- ✓ Overrun?
- ✓ Underrun?
- ✓ Not Required for Fixed Price Contracts/Orders

Rating Areas Management

- ✓Assess Integration and Coordination of All Activity Needed to Execute Contract
  - Integration and Coordination of Activity
  - Problem Identification
  - Corrective Action Plans
  - Reasonable and Cooperative Behavior
  - Customer Satisfaction
  - Subcontract Management
  - Program Management
  - Management of Key Personnel

Rating Areas
Utilization of Small Business

- ✓ Compliance with Terms and Conditions for Small Business Participation
- ✓ Achievement of Small Business Subcontracting Goals
- ✓ Good Faith Effort to Meet Small Business Subcontracting Goals

Rating Areas
Regulatory Compliance

- ✓Compliance with Contract Terms and Conditions
  - Contract Clause Requirements
  - Quality Assurance Surveillance Plan (QASP)
  - Compliance with Regulations and Codes
  - Financial
  - Environmental
  - Labor
  - Safety
  - Reporting Requirements
  - Subcontractor Payment
  - Trafficking Violations

Rate in Accordance with Definitions in FAR 42.1503 Table 42-1

Enter Proposed Ratings Requirements

- ✓ Enter Proposed Ratings and Narratives
  - 24,000 Character Limit per Evaluation Area and General Comments
  - Current Ratings
  - Changes from Past Ratings

Ratings and Narratives

Narratives are the Most Important Part of the CPAR!

Ratings and Narratives
Rating Definitions (FAR 42.1503 Table 42-1)

Rating	Contract Requirements	Problems	Corrective Actions
Exceptional	Exceeds Many – Gov't Benefit	Few Minor	Highly Effective
Very Good	Exceeds Some - Gov't Benefit	Some Minor	Effective
Satisfactory	Meets All	Some Minor	Satisfactory
Marginal	Does Not Meet Some – Gov't Impact	Serious; Recovery Still Possible	Marginally Effective; Not Fully Implemented
Unsatisfactory	Does Not Meet Most – Gov't Impact	Serious; Recovery Not Likely	Ineffective

Ratings and Narratives
Narrative Guidelines

- ✓ Address Contractor Performance
  - Recent
  - Relevant
- ✓ Collect Input From Entire Program/Project Team
- ✓ Provide Reader a Complete Understanding of the Contractor's Performance

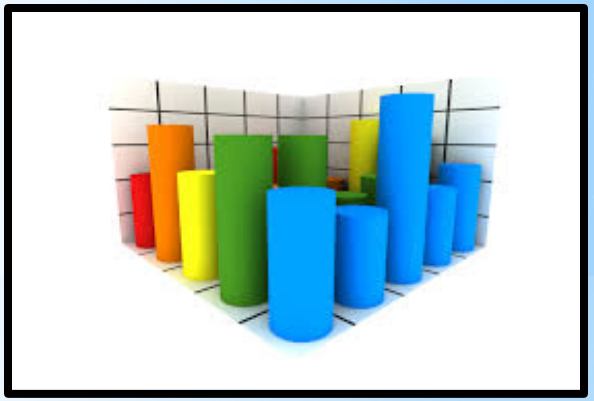
Must be Accurate, Fair, and Comprehensive

Ratings and Narratives
Narrative Guidelines

- ✓ Narrative Required for Each Rated Element
- ✓ Address:
  - Rating Changes From Prior Reports
  - Benefit/Impact to Government
- ✓ Recognize:
  - Risk Inherent in Effort
  - Government's Role in Contractor's Inability to Meet Requirements
- ✓ Indicate Major/Minor Strengths/Weaknesses

Ratings and Narratives
Narrative Guidelines

- ✓Consistent With:
  - Program Metrics
    - Program Reviews
    - Earned Value Management Data
    - Award Fees/Incentives
    - Certificates of Service
    - Cost Performance Reports
    - Quality Reviews/Evals
  - Ratings
  - Contract Objectives
- ✓Document Problems and Solutions
- ✓Contain Non-Personal and Objective Statements



Sample CPAR Narratives Elements Evaluated

- ✓ Quality
- ✓ Schedule
- ✓ Management
- ✓ Regulatory Compliance

Sample CPAR Narrative Element Evaluated: Quality

Quality – Rating: Exceptional

The Contractor is exceptional. They continue to provide high quality support and database services.

Sufficient? Yes or No

Sample CPAR Narrative NOT Sufficient

Quality – Rating: Exceptional

The Contractor is exceptional. They continue to provide high quality support and database services.

Missing:

- Detail to Support Rating
- Detail to Tell Entire Story
- Supporting Documentation/Metrics

Sample CPAR Narrative Sufficient

Quality – Rating: Exceptional

The Contractor has provided exceptional quality in support of VFED. The contract required a system backup and disaster recovery plan that was put to the test after a malicious code/virus attack. The Contractor was proactive with a successful recovery, implemented an innovative solution to prevent future attacks, and enhanced system security. The Contractor also initiated a system analysis identifying a security loophole previously overlooked at the time of database development by the previous incumbent. The Contractor was able to recommend a Commercial-Off-The-Shelf (COTS) product to resolve security issues saving custom development time and cost. The Contractor staff assisted in conducting an analysis of alternatives, market research, and application acquisition package recommendations in finding the COTS bolt-on. The Contractor experienced report generation errors resulting in unscheduled downtime after a three week period, however, they resolved the performance issue by scheduling report runtime during times of minimal system usage and optimized

Sample CPAR Narrative Element Evaluated: Schedule

Schedule – Rating: Very Good

In our opinion, the Contractor has done really well in terms of schedule. The Systems Security Manager, Jack Jones, is pleasant and easy to work with. He adapts to our schedule changes amazingly and never complains. He also went above and beyond and assembled our smart board and projector without charging the Government and he continued to meet all the contract objectives in the interim. Great job!

Sufficient? Yes or No

Sample CPAR Narrative NOT Sufficient

Schedule – Rating: Very Good

In our opinion, the Contractor has done really well in terms of schedule. The Systems Security Manager, Jack Jones, is pleasant and easy to work with. He adapts to our schedule changes amazingly and never complains. He also went above and beyond and assembled our smart board and projector without charging the Government and he continued to meet all the contract objectives in the interim. Great job!

Missing:

- Detail to Support Rating
- Supporting Documentation/Metrics

Additional Issues:

- Using Individual's Name
- Outside Contract Scope
- Subjective Phrases

Sample Narrative Statements to Avoid

- Outside Contract Scope
- In Our Opinion
- It Appeared
- We Believe
- We Hope
- We Were Not Happy
- We Did Not Like
- We Think

Sample CPAR Narrative Sufficient

Schedule – Rating: Very Good

The Contractor successfully executed the system recovery, exceeding requirements. Deployments of new releases were on schedule for this period. Per the Continuity of Operations Plan (COOP), the contractor had a 7 day timeframe for full system restoration after sustaining the attack. However, the Contractor was able to recover and bring the system online within 4 days, resulting in cost and time benefits for not having to manually track data during the downtime. This early recovery eliminated a work stoppage on engine configuration management at the customer sites. The Contractor experienced a turnover of the senior developer during the development phase of the first upgrade. However, due to replacement with a highly skilled senior developer who was able to program more quickly and efficiently, the Contractor was able to bring the final release deployment back on track with no impact to the schedule.

Sample CPAR Narrative Element Evaluated:

Management – Rating: Marginal

The Contractor has exhibited marginal management performance during this reporting period. The subcontract for Tier 1 Help Desk support was awarded 4 weeks later than required during the 30 day transition period between the previous incumbent and the Contractor. This resulted in funding increases while utilizing junior developers to provide Tier 1 Help Desk support during the time lag. The Help Desk experienced a high turnover in personnel with insufficient time to adequately train new hires. In addition, per the contract, the maximum response time for customer calls and emails is ½ day for Tier 1 support. Monthly statistics provided by the Contractor indicated a 3-4 day average. This issue was addressed in the quarterly program review and corrective actions to date have been marginally successful. Six months after the review, the Contractor implemented an aggressive recruiting and training program, thus reducing response time to 2-3 days. While this is a noted improvement, the response time is still not within contract requirements.

Sample CPAR Narrative Sufficient

Management – Rating: Marginal

The Contractor has exhibited marginal management performance during this reporting period. The subcontract for Tier 1 Help Desk support was awarded 4 weeks later than required during the 30 day transition period between the previous incumbent and the Contractor. This resulted in funding increases while utilizing junior developers to provide Tier 1 Help Desk support during the time lag. The Help Desk experienced a high turnover in personnel with insufficient time to adequately train new hires. In addition, per the contract, the maximum response time for customer calls and emails is ½ day for Tier 1 support. Monthly statistics provided by the Contractor indicated a 3-4 day average. This issue was addressed in the quarterly program review and corrective actions to date have been marginally successful. Six months after the review, the Contractor implemented an aggressive recruiting and training program, thus reducing response time to 2-3 days. While this is a noted improvement, the response time is still not within contract requirements.

Contains:

- Detail to Support Rating
- Documentation/Metrics
- Corrective Actions
- Objective Language

Sample CPAR Narrative Element Evaluated: Regulatory Compliance

Regulatory Compliance – Rating: Satisfactory

The Contractor works well on regulatory items and only encountered minimal issues with cost reporting. They always do a great job working with the Government.

Sufficient? Yes or No

Sample CPAR Narrative NOT Sufficient

Regulatory Compliance – Rating: Satisfactory

The Contractor works well on regulatory items and only encountered minimal issues with cost reporting. They always do a great job working with the Government.

Missing:

- Detail to Support Rating
- Supporting Documentation/Metrics

Additional Issues:

- Subjective Phrases

Sample CPAR Narrative Sufficient

Regulatory Compliance – Rating: Satisfactory

The Contractor has experienced some cost allocation issues in complying with the Cost Accounting Standards as required by contract clause 52.230-2. The Contractor is required to provide funds and man-hour expenditure reports for preceding monthly activity by the 10th of each month. The Contractor's accounting system experienced cost allocation issues with senior developer charges while working multiple programs. The Government observed an unusually high burn rate for the senior developers and requested a Contractor internal audit. Audit findings proved that during a 2 month period, hours were improperly allocated to this contract while the performance was conducted on a different contract. Corrective actions have been successful as senior developers were retrained on proper charging procedures, modifications were done to the Contractor's accounting system to track cost with an increased level of granularity, and invoices were corrected to reflect actual work time. An audit performed within the last month verified that all contract charges are now

Ratings and Narratives
Utilization of Small Business Rating Definitions (FAR 42.1503 Table 42-2)

Rating	Subcontracting Plan	ISR/SSR	Benefits / Impacts
Exceptional	Exceeded All Statutory Goals	Accurate & Timely	Multiple Significant Events of Benefit
Very Good	Met All Statutory Goals	Accurate & Timely	Significant Event of Benefit
Satisfactory	Good Faith Effort to Meet Goals	Accurate & Timely	Minor Problems; Major Problems w/ Corrective Action
Marginal	Deficient in Meeting Key Plan Elements	Inaccurate; Untimely	Significant Event Contractor Had Trouble Overcoming
			Multiple Significant

Utilization of Small Business

- ✓ Evaluate When Subcontracting Plan is Required
  - Contracts
  - Orders Against BOAs, BPAs, GWACs, MACs
  - Single-Agency Task/Delivery Order When Contracting Officer Determines Appropriate
- ✓ For Multi-Agency Indefinite Delivery Vehicles, Evaluated by Agency that Awarded Contract Unless Separate Small Business Subcontracting Goals in Each Order
  - Includes FSS, GWACs, MACs

Sample CPAR Narrative
Element Evaluated: Utilization of Small

Utilization of Small Business – Rating: Exceptional

The Contractor exceeded their 27% small business goal by 2 percentage points and met all of the other subcontracting goals. The Contractor awarded a subcontract to a small business for mission critical information technology for this program. The Contractor conducted three outreach events which directly led to award of subcontracts to Service Disabled Veteran Owned small businesses and HUBZone small businesses. The Contractor exceeded the small business participation requirements of the contract that required the small business to be used for 25% of the R&D portion of the contract, by awarding 50% of this requirement to small business. The Contractor submitted all required reports on time.

Contains:

- Quantifiable Accomplishments
- Comparison to Plan Goals
- Type of Work Performed by Small Business

Ratings and Narratives
Low Risk Activities

- ✓ Due to Nature of Work (Low Risk Activities) May be Difficult to Obtain Rating Above Satisfactory
- ✓ Note this Fact in the CPAR Narrative

Sample CPAR Narrative Low Risk Activities

Quality – Rating: Satisfactory

This contract is for the collection of refuse at XXX Air Force Base located near Anytown, USA. As part of its services, the Contractor is required to pick up 87 dumpsters across an approximate 30 square mile area, 12 hazardous waste containers, and 7 bio-hazardous waste material containers at the Medical Clinic located at the base. Given the nature of the services performed for this contract and the schedule for refuse collection, it would be difficult to obtain above a Satisfactory rating for performance on this contract. During this evaluation period, the Contractor met all of its refuse collection requirements on time as stated in the contract. Further, the Contractor ensured that all of the tops of the dumpsters were closed after dumping to ensure that no foreign object debris (FOD) entered the flight line area despite the locale being in an area prone to high winds. There were no incidents of improper storage or disposal of the hazardous waste or bio-hazardous waste material during this reporting period. Therefore, the rating of Satisfactory indicates performance within the requirements of the contract and that there were no problems

Narrative Hints

- ✓Communication
  - Throughout the Performance Period
  - With Contractor and Within Government
- ✓Documentation
  - Record Significant Metrics/Events Throughout the Performance Period
  - “The CPAR Should Write Itself”
- ✓Create a Working CPAR
  - Draft Online
  - Draft Offline Document
    - Use Copy and Paste

Helpful Hints Prior to Performance Period

- ✓Be Up Front
  - •Identify Expectations
  - •Discuss Areas to be Evaluated
- ✓Provide CPARS Guide to Contractor and Evaluators
  - •During Post-Award Conference
  - •Prior to Annual Evaluation
- ✓Leave Yourself Flexibility

Don’t wait until the annual evaluation to make your contractor aware of performance!

Helpful Hints During Performance Period

- ✓Communicate With Contractor
  - Provide Feedback
- ✓Document Performance Regularly
  - Status Reports
  - Earned Value Management Data
  - Monthly Certificates of Service
  - Award Fee Evaluations
  - Program Reviews
  - Earned Contract Incentives
  - COR Documentation

Helpful Hints
After Performance Period

- ✓Provide Contractor Draft Evaluation
- ✓Contractor May Provide Self-Assessment
- ✓Take Time to Acknowledge Contractor Concerns
  - Face to Face Meetings
- ✓Document File if No Contractor Comments Received
  - Transmittal Email
  - Phone Conversation
  - Efforts to Contact Contractor

Helpful Hints
Characteristics of a Lose-Lose CPAR

- ✓ Use as a “Big Stick”
- ✓ Solicit Out of Scope Work
- ✓ Establish a Negotiation Position
- ✓ Rate Government Program Manager
- ✓ “Nobody Grades as Hard as I Do”
- ✓ Document Performance Outside of Contract

Helpful Hints
Characteristics of a Win-Win CPAR

- ✓ Fair
- ✓ Relevant
- ✓ Comprehensive
- ✓ Repeatable Process
- ✓ Timely
- ✓ Accurate
- ✓ Consistent

Ratings and Narratives

Bottom Line:

Accurate and Complete CPARs Help Ensure Better Quality Products and Services!

Customer Support & Website

- ✓Customer Support Desk
  - Monday – Friday: 6:30 am – 6:00 pm ET
  - Commercial: 207-438-1690
  - Email: webptsmh@navy.mil
- ✓CPARS Website: https://www.cpars.gov
  - System Logon
  - Guidance for CPARS Document
  - User Manual
  - Training Information
  - Quality Checklist
  - FAQs

Next Steps

- ✓ Evaluate All Eligible Contracts and Orders
- ✓ Complete Evaluations in a Timely Manner
- ✓ Improve Detail and Quality of Narratives
  - Ratings Must be Credible and Justified

THANK
YOU !